

ORIGINAL

MATTHEW H. MEAD,
United States Attorney
NICHOLAS VASSALLO,
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District of Wyoming
P.O. Box 668
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FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

JAN 19 2007

Stephan Harris, Clerk
Cheyenne

MICHAEL G. PITMAN (*Pro Hac Vice* Pending)
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
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UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

United States of America,

Plaintiff,

v.

Jane Joyce Rice; Water Garden, Inc.;
Perpetual Legacy Corp., Carte Blanche
Trust; & Newport Pacific Trust Co., Ltd.;

Defendants.

Civil No.

07CV 019-B

MOTION FOR ADMISSION *PRO HAC VICE*

Without waiving objection to the application of U.S.D.C.L.R. 83.12.2(b) to federal government attorneys, the undersigned attorney, Nicholas Vassallo, Assistant United States Attorney for the District of Wyoming, and an attorney for the United States, submits this motion for admission *pro hac vice*, and hereby moves this Court, pursuant to U.S.D.C.L.R. 83.12.2(e), for an Order admitting Michael G. Pitman, an attorney with the Tax Division of the United States

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Department of Justice, to appear and participate as attorney for the United States in the above-captioned action. In support of this motion, counsel submits the original Declaration of Michael G. Pitman, executed on January 9, 2007, which reflects that he is admitted to practice before the highest court in the State of New York.

Contact Information for Michael G. Pitman:

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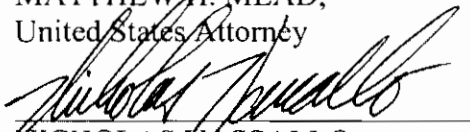
The undersigned Assistant United States Attorney is a member of good standing of the Bar of the State of Wyoming and the Bar of the United States District Court for the District of Wyoming, and is fully prepared to represent the Plaintiff at any time in any capacity, and vouches for the good moral character and veracity of Michael G. Pitman.

WHEREFORE, the undersigned requests that the Motion for Admission *Pro Hac Vice* be granted. A proposed Order is filed herewith.

Respectfully submitted:

Dated: January 19th, 2007

MATTHEW H. MEAD,
United States Attorney


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P.O. Box 668
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Ltd.;

Defendants.

**DECLARATION OF MICHAEL G. PITMAN IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

Comes now Michael G. Pitman, and declares as follows:

1. I am a trial attorney with the Tax Division of the United States
Department of Justice.

2. In my capacity as an attorney with the United States Department of Justice, I am assuming the representation of the United States of America in the above-captioned case.

3. I graduated from the Georgetown University Law Center, Washington D.C., in 2002.

4. I was admitted to practice before: the highest Court in the State of New York in November, 2002; the highest Court in the District of Columbia in November, 2003; and the United States District Court for the District of Columbia in May, 2004.

5. I am not admitted to practice in the State of Wyoming.

6. I am in good standing in all the jurisdictions to which I have been admitted, and I have never been the subject of a disciplinary or grievance proceeding.


7. I will comply with, and be bound by, the Local Rules of the United States District Court for the District of Wyoming.

8. I submit to, and am subject to, the disciplinary jurisdiction of the Court for any alleged misconduct arising in the course of preparation and representation in the proceedings.

9. I acknowledge that local counsel is required to be fully prepared to represent the client at any time, in any capacity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16 day of January, 2007.

A handwritten signature in black ink, appearing to read "M. Pitman", written over a horizontal line.

MICHAEL G. PITMAN
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